

Honorable Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID A. GOULD, et al.,

Defendants.

Case No. 2:16-cv-1041-TSZ

**MARCH 24, 2025 RECEIVER'S  
PROGRESS REPORT AND NOTICE  
OF PENDING SALE**

Pursuant to the Court's order dated September 30, 2024 (Dkt. 186 at 6), the Receiver submits a second progress report to the Court and the parties on the status of the sale of the real property located at 6109 Evergreen Way, Ferndale, Washington 98248 (the "Subject Property").

The Subject Property is under contract to be sold for \$420,000 in accordance with the Court's order authorizing the sale of the property for \$420,000 or more. *See* Dkt. 188. The signed contract, redacted for the protection of non-parties, is attached as Exhibit A. *See* Dkts. 215–219. On March 19, 2025, the buyer approved the inspection of the Subject Property. Closing is currently set for April 18, 2025 but may be extended. Ex. A at 1. Sale proceeds will be disbursed by the escrow company according to the instructions given in the Court's September 30, 2024 order. Dkt. 186 at 3–4.

1 Dated: March 24, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 24, 2025, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will provide electronic notice to all parties that have appeared in this action.

/s/ Lolita De Palma  
LOLITA DE PALMA  
Trial Attorney, Tax Division  
U.S. Department of Justice